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8 Attorneys for Plaintiffs
9 JOHN STEVENS and RITA STEVENS

10 **UNITED STATES DISTRICT COURT**
11 **CENTRAL DISTRICT OF CALIFORNIA**

12 JOHN STEVENS and RITA
13 STEVENS,

14 Plaintiffs,

15 v.

16 KIA AMERICA INC.; and DOES 1
17 through 10, inclusive

18 Defendants.

Case No. 5:22-cv-01625-SSS-KK

**Request for Entry of Judgment
Pursuant to FRCP 68(a)**

[Complaint Filed: September 14, 2022]

1 **TO THE HONORABLE COURT AND ALL PARTIES AND THEIR**
2 **ATTORNEYS OF RECORD:**

3
4 **PLEASE TAKE NOTICE** Plaintiffs JOHN STEVENS and RITA
5 STEVENS accepted Defendant KIA AMERICA INC.'s Offer of Judgment
6 Pursuant to Fed. R. Civ. P. 68 on March 7, 2023, which is attached hereto as
7 **Exhibit 1**. Plaintiffs hereby apply for the entry of judgment thereon pursuant to
8 the terms of the Rule 68 attached herein.

9
10 Dated: March 9, 2023

STRATEGIC LEGAL PRACTICES, APC

11
12 */s/ Tionna Dolin*

13
14 TIONNA DOLIN
Attorneys for Plaintiffs

SJL LAW LLP
Julian G. Senior (SBN: 219098)
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Attorneys for Defendant KIA AMERICA, INC.

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA - EASTERN DIVISION**

JOHN STEVENS and RITA STEVENS,)	CASE NO.: 5:22-cv-01625-SSS-KK
)	
Plaintiffs,)	Assigned to: Sunshine Suzanne Sykes
)	Courtroom: 2
vs.)	
)	KIA AMERICA, INC'S OFFER OF
)	JUDGMENT PURSUANT TO
KIA MOTORS AMERICA, INC.;)	FEDERAL RULE OF CIVIL
and DOES 1 through 10, inclusive,)	PROCEDURE 68
)	
Defendants.)	
)	
)	
)	

TO PLAINTIFFS AND THEIR ATTORNEYS OF RECORD:

Defendant Kia America, Inc. fka Kia Motors America, Inc. ("KA") hereby offers to allow entry of judgment to be taken against it pursuant to Rule 68 of the Federal Rules of Civil Procedure in favor of Plaintiffs John Stevens and Rita Stevens (collectively "Plaintiffs") and against Defendant KA, as follows:

1. KA will pay Plaintiffs thirty-six thousand dollars (\$36,000).
2. KA will allow Plaintiffs to file a noticed motion, pursuant to Civil Code 1794(d), for the Court to decide how much to award Plaintiffs for their

1 reasonable, necessary, and actually incurred amount of attorneys' fees, expenses
2 and costs in this matter.

3 In exchange for the above consideration, Plaintiffs shall stipulate to dismiss
4 this entire action of all parties and all causes of action with prejudice.


5 To accept this offer, Plaintiffs must serve written notice of acceptance
6 thereof within fourteen (14) days of the date this offer is made.

7 DATED: February 13, 2023

SJL LAW LLP

8
9 By: /s/ Corinne D. Orquiola
10 Julian G. Senior
11 Corinne D. Orquiola
12 Attorneys for Defendant
13 KIA AMERICA, INC

14
15 DATED: March 7, 2023

16 By: 
17 _____
18 Tionna Dolin
19 Attorney for Plaintiffs
20 John Stevens and Rita Stevens
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CERTIFICATE OF ELECTRONIC SERVICE

I hereby certify that on **February 13, 2023** a true and correct copy of the foregoing **KIA AMERICA, INC'S OFFER OF JUDGMENT PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 68** was electronically served to the following counsel of record:

Tionna Dolin
Marcy Gribin-Sanchez
Sean Crandall
Matthew Pardo
Ariel Harman-Holmes
STRATEGIC LEGAL PRACTICES, APC
1888 Century Park, East, 19th Floor
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CERTIFICATE OF SERVICE

I, the undersigned, declare that I am over the age of 18 and am not a party to this action. I am employed in the City of Los Angeles, California; my business address is Strategic Legal Practices, A Professional Corporation at 1888 Century Park East, Floor 19, Los Angeles, California 90067.

On the date below, I served a copy of the foregoing document entitled:

Request for Entry of Judgment Pursuant to FRCP 68(a)

on the interested parties in said case as follows:

Served Electronically Via the Court's CM/ECF System

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. I declare that I am employed in the office of a member of the Bar of this Court, at whose direction the service was made. This declaration is executed in Los Angeles, California on March 10, 2023.



Kyara Galloway